

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

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U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA.

DARREN ANDERSON, BRENDA )  
AUSTIN, MARY L. AVERY, SHIRLEY )  
ANN BORDERS, CARLA BYRTS, )  
CASSANDRA D. CALHOUN, )  
CORNELIUS COBBS, EDNA )  
COLEMAN, CAROLYN M. COOPER, )  
DEDDERA DAVIS, CAROLYN J. )  
DOWDELL, TREVOR FERRELL, )  
DIANNE FINNEY, MARGARET )  
FOSTER, SANDRA FRANKLIN, )  
DERRICK GACHET, ROBERT )  
GOODE, TERESA ANN GRAVES, )  
ALONZA HAMPTON, ANTWAIN )  
HARRIS, JOE L. HATCHER, )  
RODNEY HATCHER, DORIS )  
HOLMES, CHARLENE HOOKS, )  
KRESHAN R. JOHNSON, ROSARIO )  
JOHNSON, KEVIN KEITH, TIFFANY )  
M. KING, MICHAEL LAWRENCE, )  
KAWAQUANE LEE, FANNIE B. )  
LOCKWOOD, SANTANA )  
MCCLENDON, DUANE MOMENT, )  
DEBORAH D. MORRIS, SHIRLEY )  
PATTERSON, DEMETRIUS RIVERS, )  
AGGIE LEE SCOTT, CARLOS )  
STANLEY, RUBY STEPHENS, )  
MARCHE STEWART, DARLENE A. )  
TARVER, ALICE TOWNSEND, EULA )  
M. TOWNSEND, MARTHA A. )  
TUGGLES, MARY J. WASHINGTON, )  
CALLIE M. WILLIAMS, JOYCE R. )  
ADDISON, ALBERT K. ANDERSON, )  
CAROLYN E. ANTHONY, CHERYL )  
ANTHONY, TERRANCE K. ANTHONY, )  
LUCILLE W. AUSTIN, VANESSA )  
BABERS, DOROTHY BAKER, )  
MATTIE BAKER, NONA REE )  
BALDWIN, MARY N. BANDY, )  
LASHONDRA BEASON, LEON )  
BOWENS, KATHY BURNEY, ANNIE )  
BUSSEY, VALARIE BYRTS, BEVERLY )  
CALHOUN, TOMECHA CANTY, )  
MARTHA M. CHANCE, JACQUELINE )

DEMAND FOR JURY TRIAL

COOPER, EBONIA L. COPES, )  
 JAWANNA CUNNINGHAM, )  
 MARQUETTA L. CUNNINGHAM, )  
 RONALD DAVIE, DELORES DAVIS, )  
 KIRBY DAVIS, REGINA A. DAWKINS )  
 GILLIS, MARY ANN DULANEY, )  
 LAKESHA EFFORD, BOBBIE J. ELLIS,) )  
 DELORIS ELLIS, DENISE R. ELLIS, )  
 HELEN ELLIS, MAMIE FITZATRICK, )  
 CATHLEEN THOMAS FOSTER, )  
 TERRENCE FRANKLIN, DERRICK )  
 GOODE, MICHAEL GOODE, MARK )  
 GOSHAY, TERESA M. GREY, JUSTIN )  
 HALL, SHONA HAMPTON, HENRY )  
 HARRIS, JR., JIMMY HATCHER, )  
 NICKLOUS HILL, RICHETTA )  
 HOLLIDAY, QUINOSHA HOOKS, )  
 EDDIE M. HOUGH, BYTHINE H. )  
 IVERY, ALONZO JACKSON, BETTYE )  
 A. JACKSON, EVELINA JACKSON, )  
 FRANCES JACKSON, SUSIE A. )  
 JACKSON, JESSICA M. JENKINS, )  
 DORETHA JOHNSON, PAMELA )  
 JOHNSON, RECIKE JOHNSON, )  
 BRUCE JONES, DWIGHT JONES, )  
 LORETTA R. JONES, LUCY JONES, )  
 REGGIE PARNELL JONES, TIMOTHY )  
 JORDAN, TRELLIS S. JORDAN, )  
 JENNIFER KEY, DEVORIS LAMPLEY,) )  
 KAREN LEE, REGENIA F. LONG, )  
 ANNIE PEARL MACK, FRANKIE M. )  
 MADDOX, JESSE MAHONE, NEKESIA )  
 MARTIN, HELEN L. MASON, SHEILA )  
 MCCLAIN, QUNNIE L. MCCLENDON, )  
 SHAWANNA MCSWAIN, VIOLA LEE )  
 MONDAY, JEFFERY MURRAY, JOAN )  
 M. OLIVER, LAMISHA OLIVER, )  
 GEORGE PALM, BOBBIE A. )  
 PARHAMS GEORGE PARHAM, )  
 DANNY PARKER, HARVEY C. )  
 PARKER, LENETT PATTERSON, )  
 SHIRTORIA PATTERSON, JAIME )  
 PEEBLES, RUBY PEEBLES, RACHEL )  
 PENN, RUBY M. PERSON, PEGGY L. )  
 PITTS, DELOIS PRITCHETT, MARIE )  
 PRITCHETT, OLLIE M. PUGH, BETTY )  
 J. RANDOLPH, DELOISE RANDOLPH,) )  
 MARY DEAN RAYBURN, OLA MAE )

REED, TRACY ROBBINS, ALFRED )  
ROBINSON, CHRISTINE RODGERS, )  
MATTIE P. RODGERS, LARRY )  
RUMPH, SHERRY RUMPH, JOHN W. )  
SCOTT, FREDDIE LEE SHELLEY, )  
MAYOLA SHELLEY, BEVERLY A. )  
SIMMONS, TAMMY J. SMART, )  
ALTHEA SMITH, CHAROLETTE )  
SMITH, DESSIE SMITH, GLORIA )  
SMITH, JANEKIA SMITH, MARY )  
SPANN, EUNICE B. SPARKS, )  
KIMBERLYN SPRAKS, MARVIN )  
STEWART, LANETHIA STILL, )  
DARLENE A. SULLEN, LAWANDA )  
TARVER, LILLIE B. TARVER, )  
SABRENA M. TARVER, SHERRY )  
TARVER, THERESA ANN TARVER, )  
WENDY TARVER, MARY E. THOMAS,)  
TUWANDA THOMAS, PAMELA )  
THORPE, TERRANCE WARMACK, )  
PLESHETTE WILLIAMS, ALAN )  
WILLIAMSON, LAURIE ANN WILLIS,)  
LAQUETTA WOODS, VERA WRIGHT,)  
BETTY JEAN YOUNG, ANGELA )  
YOUNGLOOD, CHRISTINE )  
YOUNGLOOD, DARNAILLEE )  
YOUNGBLOOD, and SHIRLEY P. )  
YOUNGBLOOD )

Plaintiffs, )

vs. )

WAYNE FARMS LLC., a Delaware )  
Corporation doing business in Alabama, )

Defendant. )

Case No.: 2:06-cv-951-ID  
~~06-cv-~~

### COMPLAINT

Plaintiffs, individually and on behalf of all others similarly situated ("Plaintiffs"),  
by and through their counsel, for their Complaint against Defendant Wayne Farms LLC.,  
(collectively "Wayne Farms" or "Defendant"), seek to recover for Wayne Farms'

violations of the Fair Labor Standards Act of 1938 (FLSA), 29 U.S.C. §§ 201 *et seq.*, and hereby state and allege as follows:

### **INTRODUCTION**

1. This is a representative action brought pursuant to FLSA § 216(b) by Plaintiffs on behalf of themselves and all other similarly situated current and former production employees of Wayne Farms at its Union Springs facility, located in Bullock County, Alabama, for purposes of obtaining relief under the FLSA for unpaid wages, unpaid overtime wages, liquidated damages, costs, attorneys' fees, declaratory and/or injunctive relief, and/or any such other relief the Court may deem appropriate.

2. Wayne Farms operates a chicken processing plant in Union Springs, Alabama ("Union Springs facility"). The complained of unlawful compensation system at issue in this Complaint has affected Defendant's present and former hourly production employees at this location.

3. In *IBP, Inc. v. Alvarez*, 126 S. Ct. 514 (2005), the United States Supreme Court unanimously affirmed a ruling that IBP's wage and hour policies – those at issue in this case – violated the Fair Labor Standards Act of 1938 ("FLSA").

4. Wayne Farms uniformly denies hourly wages and overtime premium pay to its employees, by requiring them to perform "off the clock" work. Wayne Farms' deliberate failure to pay employees earned wages and overtime compensation violates federal law as set out in the Fair Labor Standards Act.

5. Plaintiffs perform multiple tasks, but are all victims to the same illegal policy and practice of failing to pay workers for all time worked, including unpaid, but compensable break periods, unpaid hourly wage times and unpaid overtime premium wage times.

### **JURISDICTION AND VENUE**

6. The FLSA authorizes court actions by private parties to recover damages for violation of the FLSA's wage and hour provisions. Jurisdiction over Plaintiffs' FLSA claims is based upon 29 U.S.C. § 216(b) and 28 U.S.C. §§ 1331-37.

7. Venue in this district is proper pursuant to 28 U.S.C. § 1391(b) and (c), because Wayne Farms does business in this district and a substantial part of the unlawful conduct giving rise to the claims occurred in this district.

### **PARTIES**

8. Defendant, Wayne Farms LLC., is a Delaware corporation with its principal place of business in Georgia.

9. Plaintiffs are current and former Wayne Farms employees who work(ed) at the Wayne Farms Union Springs facility within the last three years, dating back to October 17, 2003, and can be generally categorized herein as "First Processing" and "Second Processing" employees.

10. First Processing generally includes those employees who work in an area of the plant where the product (chickens) is introduced into the plant and placed or hung on "the line" for killing, cleaning, disemboweling, and chilling.

11. Second Processing generally includes those employees who work in an area of the plant where after the product has completed First Processing, it is further processed, prepared, cut-up, marinated, deboned, weighed, sized, packed, loaded on trucks, etc. for delivery to plant customers.

12. Plaintiffs listed herein who primarily work in First Processing include: Darren Anderson, Brenda Austin, Mary L. Avery, Shirley Ann Borders, Carla L. Byrds,

Cassandra D. Calhoun, Cornelius Cobbs, Edna Coleman, Carolyn M. Cooper, Deddera Davis, Carolyn J. Dowdell, Trevor Ferrell, Dianne Finney, Margaret Foster, Sandra Franklin, Derrick Gachet, Robert Goode, Teresa Ann Grave, Alonza Hampton, Antwain Harris, Joe L. Hatcher, Rodney Hatcher, Doris Holmes, Charlene Hooks, Kreshan R. Johnson, Rosario Johnson, Kevin Keith, Tiffany M. King, Michael Lawrence, Kawaquane Lee, Fannie B. Lockwood, Santana McClendon, Duane Moment, Deborah D. Morris, Shirley Patterson, Demetrius Rivers, Aggie Lee Scott, Carlos Stanley, Ruby Stephens, Marche Stewart, Darlene A. Tarver, Alice Townsend, Eula M. Townsend, Martha A. Tuggles, Mary J. Washington, and Callie M. Williams.

13. Plaintiffs listed herein who primarily work in Second Processing include: Joyce R. Addison, Alberta K. Anderson, Carolyn E. Anthony, Cheryl Anthony, Terrance K. Anthony, Lucille W. Austin, Vanessa Babers, Dorothy Baker, Mattie Baker, Nona Ree Baldwin, Mary N. Bandy, LaShondra Beason, Leon Bowens, Kathy Burney, Annie Bussey, Valarie Byrts, Beverly Calhoun, Tomecha Canty, Martha M. Chance, Jacqueline Cooper, Ebonia L. Copes, Jawanna Cunningham, Marquette L. Cunningham, Ronald Davie, Delores Davis, Kirby Davis, Regina A. Dawkins Gillis, Mary Ann Dulaney, Lakesha Efford, Bobbie J. Ellis, Deloris Ellis, Denise R. Ellis, Helen Ellis, Mamie Fitzpatrick, Cathleen Thomas Foster, Terrence Franklin, Derrick Goode, Michael Goode, Mark Goshay, Teresa M. Grey, Justin Hall, Shona Hampton, Henry Harris, Jr., Jimmy Hatcher, Nicklous Hill, Richetta Holliday, Quinosha Hooks, Eddie M. Hough, Bythine H. Ivery, Alonzo Jackson, Bettye A. Jackson, Evelina Jackson, Frances Jackson, Susie A. Jackson, Jessica M. Jenkins, Doretha Johnosn, Pamela Johnson, Recike Johnson, Bruce Jones, Dwight Jones, Loretta R. Jones, Lucy Jones, Reggie Parnell Jones, Timothy Jordan, Trellis S. Jordan, Jennifer Key, Devoris Lampley, Karen Lee, Regenia F. Long,

Annie Pearl Mack, Frankie M. Maddox, Jesse Mahone, Nekesia Martin, Helen L. Mason, Sheila McClain, Qunnie L. McClendon, Shawanna McSwain, Viola Lee Monday, Jeffery Murray, Joan M. Oliver, Lamisha Oliver, George Palm, Bobbie A. Parhams, George Parham, Danny Parker, Harvey C. Parker, Lenett Patterson, Shirtoria Patterson, Jaime Peebles, Ruby Peebles, Rachel Penn, Ruby M. Person, Peggy L. Pitts, Delois Pritchett, Marie Pritchett, Ollie M. Pugh, Betty J. Randolph, Deloise Randolph, Mary Dean Rayburn, Ola Mae Reed, Tracy Robbins, Alfred Robinson, Christine Rodgers, Mattie P. Rodgers, Larry Rumph, Sherry Rumph, John W. Soctt, Freddie Lee Shelley, Mayola Shelley, Beverly A. Simmons, Tammy J. Smart, Althea Smith, Charolette Smith, Dessie Smith, Gloria Smith, Janekia Smith, Mary Spann, Eunice B. Sparks, Kimberlyn Sparks, Marvin Stewart, Lanethia Still, Darlene A. Sullen, Lawanda Tarver, Lillie B. Tarver, Sabrena M. Tarver, Sherry Tarver, Theresa Ann Tarver, Wendy Tarver, Mary E. Thomas, Tuwanda Thomas, Pamela Thorpe, Terrance Warmack, Pleshette Williams, Alan Williamson, Laurie Ann Willis, LaQuetta Woods, Vera Wright, Betty Jean Young, Angela Youngblood, Christine Youngblood, Dernaillee Youngblood, and Shirley P. Youngblood.

14. Plaintiffs are residents and domiciled in the State of Alabama. Plaintiffs have concurrently filed their Consents to Become Party Plaintiffs pursuant to 29 U.S.C. § 216(b). See Exhibit A.

### **GENERAL ALLEGATIONS**

15. As an integral and indispensable part of Plaintiffs' jobs, Plaintiffs are required to pass through security when entering and leaving the facility. Plaintiffs' are required to have their employment status verified and their arrival and departures documented as well as submit to searches of the person and personal possessions.

Plaintiffs aver they are not compensated for the time it takes security to clear them and allow them into the facility and the compensable time afterwards prior to the commencement of production work.

16. Plaintiffs go to a designated area to receive required clothing and/or personal protective equipment (PPE) that is required for the work to be performed. The employees are required to don certain equipment before moving into the production areas. The employees are required to perform washing activities associated with preparing for work in the production area. And depending on whether the employee works in First Processing or Second Processing, the employee may be required to acquire special tools for the work to be performed. During the course of this process, the employee then must walk a significant distance to arrive at the respective workstations on the line.

17. When Plaintiffs leave the line for unpaid breaks or at the end of their shift, they again walk a considerable distance to their respective doffing area where they remove their personal protective equipment, wash or sanitize themselves, their personal protective equipment, sanitary clothing, and/or equipment or tools and return various clothes, personal protective equipment, equipment or tools to the proper areas.

18. Defendant Wayne Farms owns and operates poultry facilities in Union Springs, Alabama. The unlawful compensation system at issue in the Complaint has affected Defendant's former and present hourly production employees at this location.

19. Under Wayne Farms' wage compensation system, Wayne Farms pays Plaintiffs and others similarly situated employees only regularly scheduled time that they are on the production assembly line or in production areas under a system known as master time, master key, line time or gang time, collectively referred to herein as "master



time”. Conversely, as a matter of policy and practice, Wayne Farms does not pay its hourly employees for required pre-production line and post-production line activities that are necessary and integral to their overall employment responsibilities, such as the time it takes to clear security, donning and doffing protective and sanitary equipment, cleaning and sanitizing that equipment as well as themselves, walking to and from security and the production line from their locker or dressing area after already performing compensable activities, and waiting in line to return required supplies, tools and other equipment needed for line activities. In addition, Wayne Farms does not pay its employees for time spent waiting at the line, prior to the line start up. Plaintiffs are required to report to duty before the start of the master time clock and required to continue work after the master time clock has stopped.

20. During the course of the day, Plaintiffs are provided unpaid breaks requiring them to walk considerable distances where they remove sanitary clothing and personal protection equipment for their break. The remaining time allowed for the break is further shortened by the requirement for the employee to wash and sanitize, don his or her sanitary clothing and personal protection equipment and return to the workstation. Plaintiffs assert these unpaid breaks are compensable. Alternatively if the total unpaid break is not deemed compensable Plaintiffs allege they are owed compensation for the walk time prior to and after unpaid breaks, the time spent donning and doffing clothing and equipment pre and post break respectively, and the time spent washing and/or waiting to wash themselves and their equipment.

21. Defendant deducts from Plaintiffs daily time worked, without regard for the actual time spent on break, two (2) uncompensated breaks of fixed duration.

22. The time for which Plaintiffs and other similarly situated employees are paid is significantly less than the time they spend at work between the time they begin their integral, essential and indispensable work duties and the time they arrive at their workstations on the line. The work time for which Plaintiffs are not paid include, but are not limited to: (1) changing into the protective required work uniforms, sanitary clothing and protective safety equipment that can include, among other things (depending on the task and whether First or Second Processing): ear plugs, smocks, work pants and shirts; safety jump suits; safety boots; hair nets; face nets; hard hats; aprons; belts with holsters and knives; and hand and arm protections; and (2) walking to and from the changing area, work areas and break areas; washing activities; and (3) breaks that are effectively compensable .

23. The walking time for which Plaintiffs are not paid occurs after the beginning of the employee's first principal activity and before the end of the employee's last principal activity.

24. The required protective work uniforms, sanitary clothing and protective safety equipment that Plaintiffs must wear, and for which they are not paid for donning and doffing times, is required by Wayne Farms and/or by government regulation. Plaintiffs' jobs are dangerous and involve serious health and safety risks. The circumstances of Plaintiffs' jobs, including vital considerations of health and hygiene, require them to wear the protective work uniforms, sanitary clothing and protective safety equipment. These donning, doffing, washing activities, compensable unpaid breaks and walking duties all add up to a significant amount of time every day for which Plaintiffs and others similarly situated are not paid.

25. In addition to depriving Plaintiffs and others similarly situated of hourly wages for compensable time pursuant to the FLSA, Defendant Wayne Farms' failure to accurately account for and report all compensable time worked by the Plaintiffs and others similarly situated, and has deprived Plaintiffs and others similarly situated of what would otherwise be overtime pay, pursuant to the FLSA.

### **COLLECTIVE ACTION ALLEGATIONS**

26. Plaintiffs bring Count I, the FLSA claim, as an "opt-in" collective action pursuant to 29 U.S.C. § 216(b). In addition to the claims of individually named Plaintiffs, Plaintiffs bring this action as representatives of all similarly situated former and current employees of the Union Springs facility. The potential class of "opt-in" employees can be defined as:

All current and former hourly employees of Defendants who worked at the Union Springs facility since October 17, 2003, and who were not paid for all the time spent performing compensable work-related tasks or legally compensable time, including, but not limited to authorized unpaid break times, donning and doffing times, washing activity times, time associated with passing through security check points and walking to changing areas and time walking to security and passing through security at the end of the day and walking times to and from break areas or donning and doffing areas, and including time compensable at regular hourly wages, as well as overtime pay for these employees.

27. The FLSA claims may be pursued by those who opt-in to this case, pursuant to 29 U.S.C. § 216(b).

28. Plaintiffs, individually and on behalf of other similarly situated employees, seek relief on a collective basis challenging, among other FLSA violations, Defendant's practice of failing to accurately record all hours worked and failing to pay employees for all hours worked, including overtime compensation.

29. The number and identity of other Plaintiffs yet to opt-in and consent to be party Plaintiffs may be determined from the records of Defendant, and potential class members may easily and quickly be notified of the pendency of this action.

30. On information and belief, the Union Springs facility employs approximately 500 hourly wage employees who potentially have FLSA claims similar to the claims set out herein. Consequently, joinder of all collective action members in a single action is impracticable.

31. Potential collective action members may be informed of the pendency of this class action through direct mail.

32. There are questions of fact and law common to the class that predominates over any questions affecting only individual members. The questions of law and fact common to the class arising from Defendant's actions include, without limitation, the following:

- a) Whether Plaintiffs were compensated for time spent clearing security and time spent walking from security to their changing areas and from changing areas to security;
- b) Whether the security activities at issue are integral or indispensable to Defendant's business activities;
- c) Whether Plaintiffs were compensated for time spent donning and doffing clothing and protective gear, washing, and walking to and from their job posts;
- d) Whether the donning, doffing and washing activities at issue are integral or indispensable to Defendant's business activities;
- e) Whether Plaintiffs were entitled to compensation for time spent donning and doffing, washing activity time, and walking time to and from "the line";
- f) Whether Plaintiffs' donning, doffing, washing activity, and walking time is integral and indispensable to their principal activities;

- g) Whether Defendant failed to pay employees for unpaid breaks that were effectively compensable.
- h) Whether Defendant's compensation policy and practice accurately accounts for the time Plaintiffs are actually working;
- i) Whether Defendant's compensation policy and practice is illegal;
- j) Whether Defendant had a policy and practice of willfully failing to record and compensate employees for all time worked; and
- k) Whether Defendant failed to accurately record all compensable time, resulting in a failure to compensate Plaintiffs and other similarly situated employees of regular hourly wages and overtime pay, in violation of Defendant's policies and procedures and the mandate of the FLSA.

33. The questions set forth above predominate over any questions affecting only individual persons, and a class action is superior with respect to considerations of consistency, economy, efficiency, fairness and equity, to other available methods for the fair and efficient adjudication of the state law claims.

34. The Collective Action Representatives' claims are typical of those of the similarly situated employees in that these employees have been employed in the same or similar positions as the Collective Action Representatives and were subject to the same or similar unlawful practices as the Collective Action Representatives.

35. A collective action is the appropriate method for the fair and efficient adjudication of this controversy. Defendant has acted or refused to act on grounds generally applicable to the similarly situated current and former employees. The presentation of separate actions by individual similarly situated current or former employees could create a risk of inconsistent and varying adjudications, establish incompatible standards of conduct for Defendant, and/or substantially impair or impede the ability of Collective Action members to protect their interests.

36. The Collective Action Representatives are adequate representatives of the similarly situated current and former employees because they are employees of the same processing plant and their interests do not conflict with the interests of the other similarly situated current and former employees they seek to represent. The interests of the members of the class of employees will be fairly and adequately protected by the Collective Action Representatives and their undersigned counsel, who have extensive experience prosecuting complex class action lawsuits.

37. Maintenance of this action as a collective action is a fair and efficient method for the adjudication of this controversy. It would be impracticable and undesirable for each member of the collective action who suffered harm to bring a separate action. In addition, the maintenance of separate actions would place a substantial and unnecessary burden on the courts and could result in inconsistent adjudications, while a single collective action can determine, with judicial economy, the rights of all collective action members.

## **COUNT I**

### **Violation of the Fair Labor Standards Act of 1938**

**(Brought Against Defendant by All Individually-Named Plaintiffs and on Behalf of All Others Similarly Situated)**

38. Plaintiffs reassert and incorporate by reference paragraphs 1 through 37 as set forth above as if fully restated herein.

39. At all time material herein, Plaintiffs have been entitled to the rights, protections, and benefits provided under the FLSA, 29 U.S.C. § 201 *et. seq.*

40. The individually named Plaintiffs and all similarly situated employees are victims of a uniform and facility-wide compensation policy and practice, in violation of the FLSA.

41. Wayne Farms violated the FLSA by failing to account for all compensable time of its employees that resulted in a failure to pay Plaintiffs and others similarly situated for compensable hourly wages and overtime premium pay.

42. Wayne Farms violated the FLSA by failing to pay for time donning and doffing essential required equipment, integral to the principle work activity.

43. Wayne Farms failed to account for and pay for time walking to and from the line to break areas and/or donning and doffing areas.

44. Wayne Farms failed to account for and pay for time spent clearing security and for time walking to and from security to donning and doffing areas.

45. Wayne Farms failed to account for and pay for time allocated as unpaid breaks. In the alternative, Wayne Farms failed to pay for walk time to and from unpaid meal break areas, time spent donning and doffing on unpaid meal breaks, and washing activities associated with meal breaks.

46. In perpetrating these unlawful practices, Wayne Farms has also willfully failed to keep accurate records for all of the time worked by its hourly employees.

47. The FLSA regulates, among other things, the payment of overtime pay by employers whose employees are engaged in commerce, or engaged in the production of goods for commerce, or employed in an enterprise engaged in commerce or in the production of goods for commerce. 29 U.S.C. § 207(a)(1).

48. Wayne Farms was, and is, subject to the overtime pay requirements of the FLSA because it is an enterprise engaged in commerce and its employees are engaged in commerce.

49. Section 13 of the FLSA, 29 U.S.C. § 213, exempts certain categories of employees from overtime pay obligations. None of the FLSA exemptions apply to the

Plaintiffs. Accordingly, Plaintiffs must be paid overtime pay in accordance with the FLSA.

50. Wayne Farms' failure to accurately record compensable work time was willfully perpetrated. Wayne Farms has not acted in good faith nor with reasonable grounds to believe its actions and omissions were not a violation of the FLSA, and as a result thereof, Plaintiffs and other similarly situated employees are entitled to recover an award of liquidated damages in an amount equal to the amount of unpaid hourly wages and overtime premium pay described above pursuant to Section 16(b) of the FLSA, 29 U.S.C. § 216(b). Alternatively, should the Court find Wayne Farms did not act willfully in failing to pay all hourly wages and overtime premium pay wages, Plaintiffs and all similarly situated employees are entitled to an award of prejudgment interest at the applicable legal rate.

51. As a result of the aforesaid willful violations of the FLSA's overtime provisions, overtime compensation has been unlawfully withheld by Wayne Farms from Plaintiffs for which Wayne Farms is liable pursuant to 29 U.S.C. § 216(b).

52. Plaintiffs and all similarly situated employees are entitled to damages equal to the mandated overtime premium pay within the three years preceding the filing of this Complaint, plus periods of equitable tolling, because Wayne Farms acted willfully and knew, or showed reckless disregard of whether, its conduct was prohibited by the FLSA.

53. Pursuant to FLSA, 29 U.S.C. § 216(b), successful Plaintiffs are entitled to reimbursement of the costs and attorney's fees expended in successfully prosecuting an action for unpaid wages and overtime wages.



WHEREFORE, it is respectfully prayed that this Court grant to the Plaintiffs the following relief:

- a) At the earliest possible time, issue an Order allowing Notice or issue such Court supervised Notice to all similarly situated current and former Wayne Farms hourly employees (working at the Wayne Farms, Union Springs location in the last three years) of this action and their rights to participate in this action. Such Notice shall inform all similarly situated current and qualified former employees of the pendency of this action, the nature of this action, and of their right to “opt in” to this action if they worked “off the clock” for times not paid, including time that may be paid at overtime rates.
- b) Issue an Order, pursuant to the Declaratory Judgment Act, 28 U.S.C. §§ 2201-2202, declaring that Defendant Wayne Farms’ actions, as described in the Complaint, are unlawful and in violation of the FLSA and applicable regulations and are and were willful as defined in the FLSA;
- c) Issue an Order directing and requiring Defendant Wayne Farms to pay Plaintiffs and all other similarly situated employees damages in the form of reimbursement for unpaid hourly and premium overtime wages (past and future) for all time spent performing compensable work for which they were not paid pursuant to the rate provided by the FLSA;
- d) Issue an Order directing and requiring Defendant Wayne Farms to pay Plaintiffs and all other similarly situated employees liquidated damages pursuant to the FLSA in an amount equal to, and in addition to the amount of wages and overtime wages owed to them;

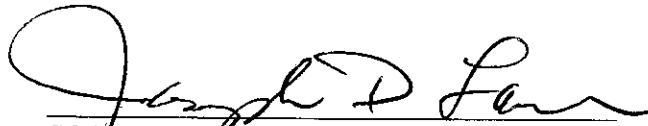
- e) Issue and Order directing Defendant Wayne Farms to reimburse Plaintiffs and other similarly situated employees for the costs and attorneys fees expended in the course of litigating this action, pre-judgment and post-judgment interest;
- f) Provide Plaintiffs with such other and further relief, as the Court deems just and equitable.

**DEMAND FOR JURY TRIAL**

All Plaintiffs hereby request trial by jury of all issues liable by jury under Alabama and federal law.

Respectfully submitted this the 17<sup>th</sup> day of October 2006.

**COCHRAN, CHERRY, GIVENS,  
SMITH, LANE & TAYLOR, P.C.**



**JOSEPH D. LANE (LAN049)**  
**LANCE H. SWANNER (SWA013)**  
**SAMUEL A. CHERRY, JR., (CHE008)**  
Attorney for Plaintiffs  
163 West Main Street  
P.O. Box 927  
Dothan, AL 36302  
(334) 793-1555  
(334) 793-8280 (fax)

Defendant may be served at:

The Corporation Company  
o/b/o Wayne Farms LLC – Union Springs Plant  
2000 Interstate Park Drive Ste 204  
Montgomery, AL 36109

# **EXHIBIT A**

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Darren Anderson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
11-5-05 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Ala., and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14 day of September, 2006.

Darren Anderson  
[PRINT NAME]

Darren Anderson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Brenda Austin states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
05/26/95 to 03-18-04.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Ala, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the Sept day of 16, 2006.

Brenda Austin  
[PRINT NAME]

Brenda Austin  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Mary Avery states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union. I worked at this location from  
[City/State]  
9-6-72 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Mary L. Avery  
[PRINT NAME]

Mary L. Avery  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Shirley Ann Borders states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
09/1980 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Shirley Ann Borders  
[PRINT NAME]

Shirley Ann Borders  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Carla Byrds states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, Alabama. I worked at this location from  
[City/State]  
1-10-90 to 9-12-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, Alabama, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of September, 2006.

Carla S Byrds  
[PRINT NAME]

Carla S Byrds  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Cassandra D. Calhoun states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms Plant at  
[Name of plant]  
the facility located in Union Spring / AL. I worked at this location from  
[City/State]  
Oct 15, 2001 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms Plant plant in Union Spring / AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 5 day of Aug Sept, 2006.

Cassandra D. Calhoun  
[PRINT NAME]

Cassandra D. Calhoun  
[SIGNATURE]

State of AL  
Bullock Co

Duke Lee  
R Feb 2008

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Cornelius Cobbs

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Union Springs Wayne Farm at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
July 29 2003 to still working.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 18 day of Sept., 2006.

Cornelius Cobbs

**PRINT NAME**

Cornelius Cobbs

**SIGN NAME**

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Edna Coleman states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
5/25/86 to 4/25/97 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 31 day of Aug, 2006.

Edna Coleman  
[PRINT NAME]

Edna Coleman  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Carolyn M. Cooper states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
~~Union Springs~~ [Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
04-16-2004 to 08-26-2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Carolyn M. Cooper  
[PRINT NAME]

Carolyn M. Cooper  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Deedera R. Davis states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Spring AL. I worked at this location from  
[City/State]  
August 2005 to Oct 2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Spring AL and  
[Name of Plant] [City/State]  
possibly other plants owned by \_\_\_\_\_. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Deedera Davis  
[PRINT NAME]

Deedera Davis  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Carolyn J. Dowdell states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
8-19-85 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 8 day of September, 2006.

Carolyn J. Dowdell  
[PRINT NAME]

Carolyn J. Dowdell  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Trevor Ferrell states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Poultry at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
02/02/06 to Present.  
[Date] [Date, or if still working write "present"]  
17-20-06
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Poultry plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Poultry. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sep, 2006.

Trevor Ferrell  
[PRINT NAME]

Trevor Ferrell  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

DIANNE FINNEY states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter. yes
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
1983 to 2006.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of Sept, 2006.

DIANNE FINNEY  
[PRINT NAME]

Dianne Finney  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Margaret Foster states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
09/09/76 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of September, 2006.

Margaret Foster  
[PRINT NAME]

Margaret Foster  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Sandra Franchi states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farmers at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
April 2002 to April 2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farmers plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farmers. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Sandra Franchi Sandra Franchi  
[PRINT NAME] [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Derrick Gachet states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Spring, AL. I worked at this location from  
[City/State]  
July 30, 1997 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Spring, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Derrick Gachet  
[PRINT NAME]

Derrick Gachet  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Robert Goode states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
11/17/04 to 03/24/05.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 15 day of September 2006.

Robert Goode  
[Signature]

Robert Goode  
[Signature]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Teresa Ann Graves states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
10-28-88 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of September, 2006.

Teresa Ann Graves  
[PRINT NAME]

Teresa Ann Graves  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Alonka Hampton states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Spring Alabama. I worked at this location from  
[City/State]  
4-16-2004 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Spring Alabama, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Alonka Hampton  
[PRINT NAME]

Alonka Hampton  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Antwain Harris states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, ALA. I worked at this location from  
[City/State]  
June 5, 1997 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs ALA, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of Sept, 2006.

Antwain Harris  
[PRINT NAME]

Antwain Harris  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Joe L. Hatcher

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
6 month of 2003 to 6 month of 03.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by \_\_\_\_\_. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 17<sup>th</sup> day of Sept., 2006.

Joe L. Hatcher

**PRINT NAME**

Joe L. Hatcher

**SIGN NAME**



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Rodney Hatcher states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
7/00 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Rodney Hatcher  
[PRINT NAME]

Rodney Hatcher  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Doris Holmes states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wanye Farms at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
4/26/89 to 6/1/05.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wanye Farms plant in Union Springs Ala. and  
[Name of Plant] [City/State]  
possibly other plants owned by Wanye Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 1 day of Sep., 2006.

Doris Holmes  
[PRINT NAME]

Doris Holmes  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Charlene Hooks states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
Sept 4, 1990 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September 2006.

Charlene Hooks  
[PRINT NAME]

Charlene Hooks  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Kreshan R. Johnson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Springs Al. I worked at this location from  
[City/State]  
12-28-96 to 9-13-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs Al. and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 13 day of 9, 2006.

Kreshan R. Johnson  
[PRINT NAME]

Kreshan R. Johnson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Rosario Johnson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
5-20-98 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Rosario Johnson  
[PRINT NAME]

Rosario Johnson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Kevin Keith states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
3/17/2000 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Kevin Keith  
[PRINT NAME]

Kevin K. Keith  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Tiffany M King states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
06/19/01 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16<sup>th</sup> day of Sept., 2006.

Tiffany M King  
[PRINT NAME]

Sustana King  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Michael Lawrence states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
June 20, 2005 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Michael Lawrence  
[PRINT NAME]

Michael Lawrence  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Kawaguchi Lee states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
9/16/06 <sup>2005</sup> to 2005.  
[Date] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne farms plant in Union Springs and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 16, 2006.

Kawaguchi Lee  
[PRINT NAME]

Kawaguchi Lee  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Fannie B Lockwood states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
7/19/79 to 7/18/89 to 2006.  
[Date] [Date, or if still working write "present"]  
3/20/79
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of September, 2006.

Fannie B Lockwood  
[PRINT NAME]

Fannie B Lockwood  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Santana McClellendon states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
10/20/05 to present.  
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 06 day of October, 2006.

Santana McClellendon  
[PRINT NAME]

Santana McClellendon  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Duane Moment states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union, Springs. I worked at this location from  
[City/State]  
9/15/05 to 9/16/06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Union, Springs plant in Union, Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of 16 Sept, 2006.

Duane Ellis Moment  
[PRINT NAME]

Duane Moment  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Deborah D. Morris states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
the facility located in Union Springs, AL I worked at this location from  
07/01/99 to present.  
[Date] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
possibly other plants owned by Wayne Farms. If brought as a class  
action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Deborah D. Morris  
[PRINT NAME]

Deborah D. Morris  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Shirley Patterson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Spring AL I worked at this location from  
[City/State]  
7-21-75 to 9-25-00.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Union Spring plant in Union, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by \_\_\_\_\_. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of 9, 2006.

Shirley J. Patterson  
[PRINT NAME]

Shirley Patterson  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Demetrius Rivers states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
12-23-02 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 9, 2006.

Demetrius Rivers  
[PRINT NAME]

Demetrius T. Rivers  
[SIGNATURE]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Aggie Scott states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
01/01/76 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September 2006.

Aggie Scott  
[PRINT NAME]

Aggie Lee Scott  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Carlos Stanley states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
7-5-2005 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 15 day of September, 2006.

Carlos Stanley  
[PRINT NAME]

Carlos Stanley  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Ruby Stephens states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
9-19-1994 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 13<sup>th</sup> day of September, 2006.

Ruby Stephens  
[PRINT NAME]

Ruby Stephens  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Marche Stewart states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.

2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
4/21/98 to 9/16/06.  
[Date] [Date, or if still working write "present"]

3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.

4. I believe I have not been paid for all compensable time, which I have worked, including overtime.

5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.

6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Alabama and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 16, 2006.

Marche Stewart  
[PRINT NAME]

Marche Stewart  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

DARLENE A. TARTER

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Spring AL. I worked at this location from  
[City/State]  
1972 to 9-06 Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Spring AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of Sept, 2006.

DARLENE A. TARTER

[PRINT NAME]

Darlene A. Tarter

[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Alice Townsend states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
03-10-92 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Union Springs plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16<sup>th</sup> day of September, 2006.

Alice Townsend  
[PRINT NAME]

Alice Townsend  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

EULA m Townsend states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Spring. I worked at this location from  
[City/State]  
7-31-78 to 1-1-04.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Spring, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9<sup>th</sup> day of Sept., 2006.

EULA Townsend  
[PRINT NAME]

Eula m Townsend  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Martha A. Tuggles states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Ala I worked at this location from  
[City/State]  
March 30<sup>th</sup> 1978 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Ala, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 30<sup>th</sup> day of September, 2006.

Martha A. Tuggles  
[PRINT NAME]

Martha A. Tuggles  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Mary J. Washington states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Al. I worked at this location from  
[City/State]  
1976 to 2006 9-01-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs Al., and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 01 day of September, 2006.

Mary J. Washington  
[PRINT NAME]

Mary J. Washington  
[SIGNATURE]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Callie M. Williams states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
03/27/98 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Callie M. Williams  
[PRINT NAME]

Callie M. Williams  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Joyce Rene Addison states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
7-7-87 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of September, 2006.

Joyce R. Addison  
[PRINT NAME]

Joyce R Addison  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Alberta K Anderson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne farms at  
[Name of plant]  
the facility located in Union Spring. I worked at this location from  
[City/State]  
1994 to 2006. 6 Still working  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne farms plant in Union Spring, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 11-2006, 2006.

Alberta K Anderson  
[PRINT NAME]

Alberta K Anderson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Carolyn E. Anthony states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
the facility located in Union Springs. I worked at this location from  
6-12-84 to 9-26-06.  
[Date] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs, and  
possibly other plants owned by Wayne Farm. If brought as a class  
action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 26 day of 9, 2006.

Carolyn Anthony  
[PRINT NAME]

Carolyn Anthony  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Cheryl Anthony states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
1-25-04 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Ala. and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Cheryl Anthony  
[PRINT NAME]

Cheryl Anthony  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****1. CLERK OF THE COURT AND COUNSEL OF RECORD**

Terrence K. Anthony states the following:  
 [Print Name]

I am over 18 years of age and competent to give the following consent in this matter.

I am currently, or was formerly employed, by Wayne Farms LLC at  
 [Name of plant]  
 the facility located in Union Springs AL. I worked at this location from  
 [City/State]  
10-22-05 to 9-16-06.  
 [Date] [Date, or if still working write "present"]

I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.

I believe I have not been paid for all compensable time, which I have worked, including overtime.

I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.

I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs AL, and  
 [Name of Plant] [City/State]  
 possibly other plants owned by Wayne Farms LLC. If brought as a class  
 [Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Terrence K. Anthony  
 [PRINT NAME]

Terrence K. Anthony  
 [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Lucille W. Austin states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
5/30/1983 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 5 day of September, 2006.

Lucille W. Austin  
[PRINT NAME]

Lucille W. Austin  
[SIGNATURE]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Vanessa BABERS states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
Aug 14, 2003 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 16, 2006.

Vanessa BABERS  
[PRINT NAME]

Vanessa Babers  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**Dorothy Baker states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Poultry at  
[Name of plant]  
the facility located in Union Springs Ala I worked at this location from  
[City/State]  
Present to present  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Poultry plant in Union Springs Ala and  
[Name of Plant] [City/State]  
possibly other plants owned by \_\_\_\_\_. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.Dorothy Baker  
[PRINT NAME]Dorothy Baker  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Mattie Baker

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at the facility located in Union Springs, AL. I worked at this location from 10/19/92 to present.  
[Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and possibly other plants owned by Wayne Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of September, 2006.

Mattie Baker  
[PRINT NAME]

Mattie Baker  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

NONA Ree Baldwin states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
5-13-96 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September 2006.

NONA Ree Baldwin  
[PRINT NAME]

Nona Ree Baldwin  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****D: CLERK OF THE COURT AND COUNSEL OF RECORD**

Mary N. Bandy states the following:  
 [Print Name]

I am over 18 years of age and competent to give the following consent in this matter.

I am currently, or was formerly employed, by Wayne Farm at  
 [Name of plant]  
 the facility located in Union Springs AL. I worked at this location from  
 [City/State]  
6-5-78 to present.  
 [Date] [Date, or if still working write "present"]

I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.

4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs AL, and  
 [Name of Plant] [City/State]  
 possibly other plants owned by Wayne Farm. If brought as a class  
 [Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of Sept., 2006.

Mary N. Bandy  
 [PRINT NAME]

Mary N. Bandy  
 [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

LaShondra Beason states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently or was formerly employed, by Wayne Farms, LLC at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
01-26-2006 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms, LLC plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms, LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 21 day of September, 2006.

LaShondra Beason  
[PRINT NAME]

LaShondra Beason  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Leon Bowens states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
2-2-05 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Leon Bowens  
[PRINT NAME]

Leon Bowens  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

KATHY BURNEY states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE FARMS at  
[Name of plant]  
the facility located in UNION SPRINGS, AL. I worked at this location from  
[City/State]  
4-8-97 to 9-1-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARMS plant in UNION SPRINGS, and  
[Name of Plant] [City/State]  
possibly other plants owned by WAYNE FARMS. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 01 day of 9, 2006.

KATHY BURNEY  
[PRINT NAME]

Kathy Burney  
[SIGNATURE]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Annie Bussey  
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
5-1-97 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of September, 2006.

Annie Bussey  
[PRINT NAME]

Annie Bussey  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Valene Byrds states the following:  
 [Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
 [Name of plant]  
 the facility located in Union Springs. I worked at this location from  
 [City/State]  
5-1991 to 7-2005.  
 [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
 [Name of Plant] [City/State]  
 possibly other plants owned by Wayne Farms. If brought as a class  
 [Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 15 day of Sept., 2006.

Valerie Byrds  
 [PRINT NAME]

Valerie Byrds  
 [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Beverly Calhoun states the following:  
 [Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
 [Name of plant]  
 the facility located in Union Springs. I worked at this location from  
 [City/State]  
Feb 16, 1988 to Sept 9, -04.  
 [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that ~~this~~ <sup>Wayne Farms</sup> suit may be brought as a class action covering employees at the Beverly Calhoun plant in Union Springs AL and  
 [Name of Plant] [City/State]  
 possibly other plants owned by Wayne Farms. If brought as a class  
 [Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Beverly Calhoun  
 [PRINT NAME]

Beverly Calhoun  
 [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Tomecha Canty states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
1-28-02 to 11-03-04.  
[Date] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of Sept., 2006.

Tomecha Canty  
PRINT NAME

Tomecha Canty  
SIGN NAME

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Martha M. Chance

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
6/01 to 6/05.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Martha M. Chance

[PRINT NAME]

Martha M. Chance

[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jaqueline Cooper states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
March 2000 to 2006.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Jaqueline Cooper  
[PRINT NAME]

Jaqueline Cooper  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Ebonia L. Copes states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
07-14-04 to 06-12-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of 09, 2006.

Ebonia L. Copes  
[PRINT NAME]

Ebonia L. Copes  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jawanna Cunningham states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
3-27-1997 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL. and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16<sup>th</sup> day of Sept., 2006.

Jawanna Cunningham  
[PRINT NAME]

Jawanna Cunningham  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Marquette Cunningham states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Alabama I worked at this location from  
[City/State]  
08-03 to 01-05  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 19 day of September, 2006.

Marquette L. Cunningham  
[PRINT NAME]

Marquette L. Cunningham  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Ronald Davie states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs I worked at this location from  
[City/State]  
10/14/94 to 9/5/06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs Ala and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 5 day of Sept, 2006.

Ronald Davie  
[PRINT NAME]

Ronald Davie  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Delores Davis states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
1-7-93 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of September, 2006.

Delores Davis  
[PRINT NAME]

Delores Davis  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Kirby Davis states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne farms at the facility located in Union Spring Ala. I worked at this location from 1-26-05 to 9-16-06.  
[Name of plant]  
[City/State]  
[Date] to [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Spr. Ala., and possibly other plants owned by Wayne Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State]  
[Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 96 day of Sept, 2006.

Kirby Davis  
[PRINT NAME]

Kirby Davis  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Regina Dawkins Gillis states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE FARMS at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
Sept 16, 1997 to April 18, 2006.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARMS plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 26 day of Sept, 2006.

REGINA A. DAWKINS Gillis  
[PRINT NAME]

Regina A. Dawkins Gillis  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Mary Ann Dulaney states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
10-18-99 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of September, 2006.

Mary Ann Dulaney  
[PRINT NAME]

Mary Ann Dulaney  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Lakesha Efford states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne farms at  
[Name of plant]  
the facility located in Union Springs I worked at this location from  
[City/State]  
June 03 to May 04.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the Sept 16 day of Sept, 2006.

Lakesha Efford  
[PRINT NAME]

Lakesha Efford  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Bobbie J. Ellis states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm LLC at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
4-2-03 to I'm still working.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm LLC plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 22 day of Sept, 2006.

Bobbie J. Ellis  
[PRINT NAME]

Bobbie J. Ellis  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Deloris Ellis states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
may of 1995 to 5/10/04.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Deloris Ellis  
[PRINT NAME]

Deloris Ellis  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Denise R. Ellis states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
- - 92 to 6- - 06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept., 2006.

Denise R. Ellis  
[PRINT NAME]

Denise R. Ellis  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Helen Ellis

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
8-20-91 to 9-15-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept., 2006.

Helen Ellis

[PRINT NAME]

Helen Ellis

[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Mamie Fitzpatrick states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
1-5-83 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Union Wayne Farms LLC plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Mamie Fitzpatrick  
[PRINT NAME]

Mamie Fitzpatrick  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Cathleen Thomas Foster states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Spring. I worked at this location from  
[City/State]  
Aug 04 to April '05.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Spring Ala., and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of September, 2006.

Cathleen Thomas Foster  
[PRINT NAME]

Cathleen Thomas Foster  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**1. CLERK OF THE COURT AND COUNSEL OF RECORD**

Terrence Franklin states the following:  
[Print Name]

I am over 18 years of age and competent to give the following consent in this matter.

I am currently, or was formerly employed, by Wayne Farms at  
the facility located in Union Springs, AL I worked at this location from  
6/22/05 to present.  
[Date] [City/State] [Date, or if still working write "present"]

2. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and possibly other plants owned by Wayne Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Oct, 2006.

Terrence Franklin  
[PRINT NAME]

Terrence Franklin  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Derrick Goode states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
06-24-2004 to 11-2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Derrick Goode  
[PRINT NAME]

Derrick Goode  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Michael A. Goode

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
7-6-04 to 11-18-04.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9th day of September, 2006.

Michael A. Goode

**PRINT NAME**

Michael Goode

**SIGNATURE**



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**TO: **CLERK OF THE COURT AND COUNSEL OF RECORD**Mark A Goshay states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
9-16-2006 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action, covering employees at the Wayne Farm plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.Mark A Goshay  
[PRINT NAME]Mark Goshay  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Teresa Grey states the following:  
 [Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne farm at  
 [Name of plant]  
 the facility located in Union Spring. I worked at this location from  
 [City/State]  
10-96 to Present.  
 [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne farm plant in Union Spring and  
 [Name of Plant] [City/State]  
 possibly other plants owned by Wayne farm. If brought as a class  
 [Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 9, 2006.

Teresa M. Grey  
 [PRINT NAME]

Teresa M. Grey  
 [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Justin Hall states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
June 22, 05 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 23 day of Sep, 2006.

Justin Hall  
[PRINT NAME]

Justin Hall  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Shona Hampton states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farmer at  
[Name of plant]  
the facility located in Union Spring. I worked at this location from  
05-01-97 to 09-18-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farmer plant in Union Spring, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farmer. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 18 day of 09, 2006.  
~~05-01-97~~

Shona Hampton  
[PRINT NAME]

Shona Hampton  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Henry Harris Jr. states the following:  
(Print Name)

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
(Name of plant)  
the facility located in Union Springs, Ala. I worked at this location from  
(City/State)  
6-17-96 to present.  
(Date) (Date, or if still working write "present")
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Ala. and  
(Name of Plant) (City/State)  
possibly other plants owned by Wayne Farm. If brought as a class  
(Name of Plant)  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 23 day of September, 2006.

HENRY JR HARRIS  
(PRINT NAME)

Henry J Harris  
(SIGN NAME)

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jimmy Hatcher states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
12-05-03 to 7-8-05.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 23 day of Sep., 2006.

Jimmy Hatcher  
[PRINT NAME]

Jimmy Hatcher  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Nicklaus Hill  
[Print Name] states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
5-31-01 to 12-12-05 rehired 2-19-06 and still working presently  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Nicklaus Hill  
[PRINT NAME]

Nicklaus Hill  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Riche HA Holliday states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE Farm at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
5/29/02 to 10/16/04.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE Farm plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 10, 2006.

Riche HA Holliday  
[PRINT NAME]

Riche HA Holliday  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Quinasha Hooks states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
10/15/04 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of September, 2006.

Quinasha Hooks  
[PRINT NAME]

Quinasha Hooks  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Eddie M. Hough states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, Alabama. I worked at this location from  
[City/State]  
April 26, 1969 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, Alabama, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 4<sup>th</sup> day of September, 2006.

Eddie Mae Hough  
[PRINT NAME]

Eddie M. Hough  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Bethine Ivory states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
08/27/01 to 11/19/03.  
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14 day of September, 2006.

Bethine Ivory  
[PRINT NAME]

Bethine W. Ivory  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Lonzo Jackson states the following:  
 [Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at the facility located in Union Springs, AL. I worked at this location from 10/01/91 to present.  
 [Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and possibly other plants owned by Wayne Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
 [Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Lonzo Jackson  
 [PRINT NAME]

Lonzo Jackson  
 [SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Bettye A. Jackson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
1984 to 2004.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of Sept, 2006.

Bettye A. Jackson  
[PRINT NAME]

Bettye A. Jackson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Evelina Jackson  
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
06/26/92 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

EVELINA JACKSON  
[PRINT NAME]

Evelina Jackson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

FRANCES JACKSON states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL I worked at this location from  
9-12-91-1998 to TO THE Present Date  
[Date] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of Sept, 2006.

FRANCES JACKSON  
[PRINT NAME]

Frances Jackson  
[SIGNATURE]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Susie A. Jackson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE FARMS LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
3-6-91 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARMS LLC plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by WAYNE FARMS. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of Sept., 2006.

Susie A. Jackson  
[PRINT NAME]

Susie A. Jackson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jessica Jenkins  
[Print Name] states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms, LLC at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
May 2004 to Feb. 2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms, LLC plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms, LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Jessica M. Jenkins  
[PRINT NAME]

Jessica M. Jenkins  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

DORETHA JOHNSON states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Spgs, AL. I worked at this location from  
[City/State]  
1/4/88 to 9/15/06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Spgs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept 16, 2006.

DORETHA JOHNSON  
[PRINT NAME]

Doratha Johnson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Pamela Johnson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
9-19-92 to 9-4-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Ala and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 4, 2006.

Pamela Johnson  
[PRINT NAME]

Pamela Johnson  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Reeike Johnson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
2 - 2003 to 3 - 2004.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 18 day of Sept., 2006.

Reeike Johnson  
[PRINT NAME]

[Signature]  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Bruce Jones

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE FARMS at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
10/22/92 to Present.  
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARMS plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by WAYNE FARMS. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 15 day of September, 2006.

Bruce Jones

**PRINT NAME**

Bruce Jones

**SIGNATURE**

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Dwight Jones states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Spring. I worked at this location from  
[City/State]  
12-30-96 to 9-13-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Spring, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 13 day of 9, 2006.

Dwight Jones  
[PRINT NAME]

Dwight Jones  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Loretta R. Jones states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
3-16-82 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm LLC plant in Union Springs, Ala, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 22 day of September, 2006.

Loretta R Jones  
[PRINT NAME]

Loretta R. Jones  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

LUCY JONES

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.

2. I am currently, or was formerly employed, by Wayne Farm at the facility located in Union Springs, Ala. I worked at this location from 5-9-72 to Present.

[Name of plant]  
[City/State]  
[Date]  
[Date, or if still working write "present"]

I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.

I believe I have not been paid for all compensable time, which I have worked, including overtime.

I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.

I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs, Ala. and possibly other plants owned by Wayne Farm. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

[Name of Plant]  
[City/State]  
[Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14 day of Sept., 2006.

LUCY JONES

[PRINT NAME]

Lucy Jones

[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

MR. Reggie PARNELL JONES states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE FARMS P. Plant at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
No Sure 1-03 to 9-03 Check Record To Make Sure! (R.J.)  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARMS plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept., 2006.

MR. Reggie P. Jones  
[PRINT NAME]

Mr. Reggie Parnell Jones  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Timothy Jordan states the following:  
 [Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayen Farms at  
[Name of plant]  
 the facility located in Union Spring. I worked at this location from  
[City/State]  
01-08-04 to 03-5-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayen Farms plant in Union Spring, and  
[Name of Plant] [City/State]  
 possibly other plants owned by Wayen Farms. If brought as a class  
[Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept., 2006.

Timothy Jordan  
 [PRINT NAME]

Timothy Jordan  
 [SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Trellis S. Jordan states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Waynes Farm at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
January 17, 2003 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Waynes Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Waynes Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of September, 2006.

Trellis S. Jordan  
[PRINT NAME]

Trellis S. Jordan  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jennifer Key states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Spring. I worked at this location from  
[City/State]  
9/96 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Spring, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 24 day of September, 2006.

Jennifer Key  
[PRINT NAME]

Jennifer Key  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Deroris Lampley states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE Farms LLC. at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
1/12/04 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14 day of September, 2006.

Deroris Lampley  
[PRINT NAME]

Deroris Lampley  
[SIGN NAME]



## CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

KAREN E Lee states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Spgs AL. I worked at this location from  
[City/State]  
April 89 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Spgs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

KAREN E. Lee  
[PRINT NAME]

Karen Lee  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Regenia F. Long states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
10-07-80 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 23 day of September, 2006.

Regenia F. Long  
[PRINT NAME]

Regenia F. Long  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Annie P. Mack states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
9-19-96 to 9-13-096.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne farms plant in Union Springs AL. and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 13 day of 9-13, 2006.

Annie Pearl Mack  
[PRINT NAME]

Annie Pearl Mack  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Frankie M. Maddox states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
05/22/83 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 02 day of October, 2006.

Frankie M. Maddox  
[PRINT NAME]

Frankie M. Maddox  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jesse Mahone

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE FARMS at  
[Name of plant]  
the facility located in UNION SPRING. I worked at this location from  
[City/State]  
2 25 01 to 8-16-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARMS plant in UNION SPRING, and  
[Name of Plant] [City/State]  
possibly other plants owned by WAYNE FARMS. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of September, 2006.

Jesse Mahone

[PRINT NAME]

Jesse Mahone

[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

NEKESTA MARTIN states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE FARMS at  
the facility located in UNION SPRINGS, AL. I worked at this location from  
MARCH 18 2002 to PRESENT.  
[Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARMS plant in UNION SPRINGS, AL, and possibly other plants owned by WAYNE FARMS. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of SEPTEMBER, 2006.

NEKESTA MARTIN  
[PRINT NAME]

[Signature]  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Helen L. Mason states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
3-2-1992 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs Ala, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9th day of September, 2006.

Helen L. Mason.  
[PRINT NAME]

Helen L. Mason.  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Sheila McClain states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
1-28-97 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 22 day of Sept., 2006.

Sheila McClain  
[PRINT NAME]

Sheila McClain  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Quinnie McClendon

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNES POULTRY at the facility located in Union Springs, AL. I worked at this location from Nov. 2004 to PRESENT.  
[Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNES POULTRY plant in Union Springs, AL, and possibly other plants owned by Waynes Poultry. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 1<sup>st</sup> day of Sept., 2006.

Quinnie L McClendon  
[PRINT NAME]

Quinnie L McClendon  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

SHAWANNA MCSWAIN states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
March 19, 2002 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL., and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

SHAWANNA MCSWAIN  
[PRINT NAME]

Shawanna McSwain  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Viola Lee Monday states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, Alabama I worked at this location from  
[City/State]  
22 years to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 11, 2006.

Viola Lee Monday  
[PRINT NAME]

Viola Lee Monday  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jeffery Murray states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
July 15, 04 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Jeffery Murray  
[PRINT NAME]

Jeffery Murray  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Joan Oliver states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
10-25-91 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of September, 2006.

Joan Oliver  
[PRINT NAME]

Joan M Oliver  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Lamisha Oliver states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
11-01-2003 to 9-12-2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept., 2006.

Lamisha Oliver  
[PRINT NAME]

Lamisha Oliver  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

George Palm states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
3-02 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14 day of Sept, 2006.

George Palm  
[PRINT NAME]

George Palm  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Bobbie Ann Parhams states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
March 22, 1979 to Present.  
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept., 2006.

Bobbie A. PARHAMS  
[PRINT NAME]

Bobbie A. Parhams  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

George Parham states the following:  
 [Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
 [Name of plant]  
 the facility located in Union Springs Ala. I worked at this location from  
 [City/State]  
4/16/02 to present.  
 [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs Ala. and  
 [Name of Plant] [City/State]  
 possibly other plants owned by Wayne Farms. If brought as a class  
 [Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

George Parham  
 [PRINT NAME]

George Palm  
 [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Danny A. Parker states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
7-7-03 to 4-6-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 18 day of Sept, 2006.

Danny A. Parker  
[PRINT NAME]

Danny Parker  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**D: CLERK OF THE COURT AND COUNSEL OF RECORD**

Larvey C. Parker states the following:  
[Print Name]

I am over 18 years of age and competent to give the following consent in this matter.

I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
12-19-02 to present.  
[Date] [Date, or if still working write "present"]

I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.

I believe I have not been paid for all compensable time, which I have worked, including overtime.

I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.

I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Ala. and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14 day of October, 2006.

Larvey C. Parker  
[PRINT NAME]

Larvey C. Parker  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Lenett Patterson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
9-19-1985 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of 9 - \_\_\_\_\_, 2006.

Lenett Patterson  
[PRINT NAME]

Lenett Patterson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Shirtonia Patterson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
7/01 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16<sup>th</sup> day of September, 2006.

Shirtonia Patterson  
[PRINT NAME]

Shirtonia Patterson  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jaime Peebles states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at the facility located in Union Springs, Ala. I worked at this location from Feb. 2003 to September 18, 2003.  
[Name of plant] [City/State] [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, Ala., and possibly other plants owned by Wayne Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of September, 2006.

Jaime Peebles  
[PRINT NAME]

Jaime Peebles  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Buby Peebles states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at the facility located in Union Springs, AL. I worked at this location from 5/26/84 to Retired 6/10/00.  
[Name of plant] [City/State] [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs, AL, and possibly other plants owned by Wayne Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of Sept, 2006.

Buby Peebles  
[PRINT NAME]

Buby Peebles  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Rachel Penn states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne FARMS at  
[Name of plant]  
the facility located in Union SpSS AL. I worked at this location from  
[City/State]  
10-29-85 to 9-12-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne FARMS plant in Union SpSS AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne FARMS. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12<sup>th</sup> day of September, 2006.

Rachel Penn  
[PRINT NAME]

Rochelle Penn  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Ruby M. Person states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
08/05/97 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARM plant in UNION SPRING, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of SEPTEMBER, 2006.

RUBY M. PERSON  
[PRINT NAME]

Ruby M. Person  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Peggy L. Pitts states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Fram at  
[Name of plant]  
the facility located in Union Springs AL 36085 worked at this location from  
[City/State]  
9-22-72 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Fram plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Fram. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11<sup>th</sup> day of September, 2006.

Peggy L. Pitts  
[PRINT NAME]

Peggy L. Pitts  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Delois Pritchett states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
10/16/75 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of Sept., 2006.

Delois Pritchett  
[PRINT NAME]

Delois Pritchett  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Marie Pritchett states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
06/14/95 to present.  
[Date] [Date] or if still working write "present"
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Marie Pritchett  
[PRINT NAME]

Marie Pritchett  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Dillie M. Pugh states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
9/22/80 to 9/5/06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 5 day of Sept, 2006.

Dillie M. Pugh  
[PRINT NAME]

Dillie M. Pugh  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Betty J. Randolph states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union, Springs. I worked at this location from  
[City/State]  
3/16/76 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union, Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16<sup>th</sup> day of September, 2006.

Betty J. Randolph  
[PRINT NAME]

Betty J. Randolph  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

DeLoise Randolph states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
9-10-06 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10 day of September, 2006.

DeLoise Randolph  
[PRINT NAME]

DeLoise Randolph  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Mary Dean Rayburn states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayen Farms LLC at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
1978 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayen Farms LLC plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Mary Dean Rayburn Mary Dean Rayburn  
[PRINT NAME] [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Ola Mae Reed states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
1-3-1977 to 9-1-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs AL., and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 1, 2006.

Ola Mae Reed  
[PRINT NAME]

Ola Mae Reed  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Tracy Robbins states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Spring Al. I worked at this location from  
[City/State]  
2-2-87 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Spring Al., and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED th 24 day of Sept., 2006.

Tracy Robbins  
[PRINT NAME]

Tracy Robbins  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Alfred Robinson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs I worked at this location from  
[City/State]  
11/00 to 06/06 (current employer)  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 6 day of September 2006.

Alfred Robinson Alfred Robinson  
[PRINT NAME] [SIGNATURE]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Christine Rodgers states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
Jan 13, 1992 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Bulloch Co AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 19, 2006.

Christine Rodgers  
[PRINT NAME]

Christine Rodgers  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Mattie P. Rodgers states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Waynes Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
10-21-97 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Spas AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 09 day of September, 2006.

Mattie P. Rodgers  
[PRINT NAME]

Mattie P. Rodgers  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Larry Rumph states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Spring. I worked at this location from  
[City/State]  
4-16-06 to 9-16-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Spring, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 16, 2006.

Larry Rumph  
[PRINT NAME]

Larry Rumph  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Sherry Rumph states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE Farms at  
[Name of plant]  
the facility located in Union Spring AL. I worked at this location from  
[City/State]  
8-20-96 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE Farms plant in Union Spring, and  
[Name of Plant] [City/State]  
possibly other plants owned by WAYNE Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10 day of Sept., 2006.

Sherry Rumph  
[PRINT NAME]

Sherry Rumph  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

John Scott

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
03/02/00 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

John Scott

[PRINT NAME]

Jamew Scott

[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Freddie Lee Shelley states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
 the facility located in Union Springs AL I worked at this location from  
[City/State]  
4-16-1990 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL and  
[Name of Plant] [City/State]  
 possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9<sup>th</sup> day of Sept, 2006.

Freddie Lee Shelley  
PRINT NAME

Freddie Lee Shelley  
SIGN NAME

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

MAVOLA Shelley states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
09/03 to 05/05.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action, covering employees at the Wayne Farm plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 16, 2006.

MAVOLA SHELLEY  
[PRINT NAME]

Mavola Shelley  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Beverly Simmons states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
08/15/96 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 29 day of September 2006.

Beverly Simmons  
[PRINT NAME]

Beverly A Simmons  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Tammy J. Smart states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
07/18/00 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
3. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 03 day of October, 2006.

Tammy J. Smart  
[PRINT NAME]

Tammy J. Smart  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Althea Smith states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wanye Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
May 01, 97 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any. yes
4. I believe I have not been paid for all compensable time, which I have worked, including overtime. yes
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court. yes
6. I understand that this suit may be brought as a class action covering employees at the Wanye Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wanye Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class. yes

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.  
~~29~~ ~~16~~

Althea Smith  
[PRINT NAME]

Althea Smith  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Charollette Smith states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
5/18/94 to present.  
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 13 day of September, 2006.

Charollette Smith  
[PRINT NAME]

Charollette Smith  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Dessie Smith states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE FARMS at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
6-18-2000 to 9-9-2006.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE FARMS plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by WAYNE FARMS. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 9, 2006.

Dessie Smith  
[PRINT NAME]

Dessie Smith  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Gloria Smith states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at the facility located in Union Springs, AL I worked at this location from 6/5/1997 to 8/21/2002.  
[Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and possibly other plants owned by Wayne Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 22 day of September 2006.

Gloria Smith  
[PRINT NAME]

Gloria Smith  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Janehia Smith states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
Jan 2003 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Janehia Smith  
[PRINT NAME]

Janehia Smith  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Mary E Spann states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayn Farm at  
[Name of plant]  
the facility located in Union Spring. I worked at this location from  
[City/State]  
4-17-89 to 9-16-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Spring AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept., 2006.

Mary Spann  
[PRINT NAME]

Mary Spann  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Eunice B. Sparks states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
9-17-86 to Until Now.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 1<sup>st</sup> day of September, 2006.

Eunice B. Sparks  
[PRINT NAME]

Eunice B. Sparks  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Kimberlyn Denise Sparks states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Spring, Alabama I worked at this location from  
[City/State]  
July 21, 1999 to Present  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Union Spring Wayne Farms Plant in Union Spring, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Kimberlyn Sparks Kimberlyn Sparks  
[PRINT NAME] [SIGNATURE]

## CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Marvin Stewart states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
10-27-04 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10<sup>th</sup> day of September, 2006.

Marvin Stewart  
[PRINT NAME]

Marvin Stewart  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Lanethia Still states the following:  
 [Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
 [Name of plant]  
 the facility located in Union Springs. I worked at this location from  
 [City/State]  
8-19-97 to 1-13-06.  
 [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
 [Name of Plant] [City/State]  
 possibly other plants owned by Wayne Farms. If brought as a class  
 [Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 16, 2006.

Lanethia Still  
 [PRINT NAME]

Lanethia Still  
 [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Darlene A. Sullen states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
06/03/80 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms, LLC plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 2 day of September, 2006.

Darlene A. Sullen  
[PRINT NAME]

Darlene A. Sullen  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Lawanda Tarver states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
09-22-06 to 11/2004.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 09 day of 22, 2006.

Lawanda Tarver Lawanda Tarver  
[PRINT NAME] [SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Lillie B. Tarver states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
1979 09/01/09 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 16, 2006.

Lillie B. Tarver  
[PRINT NAME]

Lillie B. Tarver  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Sabrina M. Tarver

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms, LLC at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
Dec. 23, 2002 to Aug. 8, 2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11<sup>th</sup> day of September, 2006.

Sabrina M. Tarver  
[PRINT NAME]

Sabrina M. Tarver  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Sherry Tarver states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
July 7 1999 to December 3, 2003  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 20 day of Sept, 2006.

Sherry Tarver  
[PRINT NAME]

Sherry Tarver  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Theresa Ann Turner states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
May 7 1997 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 13 day of September, 2006.

Theresa Ann Turner  
[PRINT NAME]

Theresa Ann Turner  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Wendy Tarver states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
10-30-1992 to 12-2003.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 23, 2006.

Wendy Tarver  
[PRINT NAME]

Wendy Tarver  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Mary E. Thomas states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at the facility located in Union Springs. I worked at this location from 6-28-79 to Present.  
[Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs, and possibly other plants owned by Wayne Farm. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept., 2006.

Mary E. Thomas  
[PRINT NAME]

Mary E. Thomas  
[SIGN NAME]

## CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

TUWANDA L. THOMAS

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Waynes Farms at the facility located in Union Springs, AL. I worked at this location from Sept. 2004 to JAN. 2005.  
[Name of plant] [City/State] [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Waynes Farms plant in Union Springs, AL, and possibly other plants owned by Waynes Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.  
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 13<sup>th</sup> day of September, 2006.

TUWANDA THOMAS

[PRINT NAME]

(Tuwanda Thomas)

[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Pamela Therpe states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
Sept 2003 to Feb 2004 to \_\_\_\_\_  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

Pamela Therpe  
[PRINT NAME]

Pamela Therpe  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Terrence Warmack states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
1-18-06 to 9-29-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Ala., and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 29 day of September, 2006.

Terrence Warmack  
[PRINT NAME]

Terrence Warmack  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Pleshette Williams states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
(Name of plant)  
 the facility located in Union Springs Alabama I worked at this location from  
(City/State)  
Dec 07 03 to July 04 2004.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs Alabama and  
(Name of Plant) (City/State)  
 possibly other plants owned by Wayne Farms. If brought as a class  
(Name of Plant)  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

Pleshette Williams  
PRINT NAME

Pleshette Williams  
SIGNATURE

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Alan Williamson states the following:  
 [Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
 the facility located in Union Springs AL. I worked at this location from  
[City/State]  
10/20/99 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
3. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs AL and  
[Name of Plant] [City/State]  
 possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of 10, 2006.

Alan Williamson  
**PRINT NAME**

Alan Williamson  
**SIGNATURE**

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Laurie Ann Willis states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by WAYNE Farm at  
[Name of plant]  
the facility located in UNION SPRING I worked at this location from  
[City/State]  
4-18-03 to still working  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the WAYNE Farm plant in UNION SPRING, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9<sup>th</sup> day of September, 2006.

Laurie Ann Willis  
[PRINT NAME]

Laurie Ann Willis  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

LaQuetta Woods states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
Aug 2005 to Nov 2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of September, 2006.

LaQuetta Woods  
[PRINT NAME]

LaQuetta Woods  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Vera Wright states the following:  
[Print Name]

Mailed

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
[Name of plant]  
the facility located in Union Spring. I worked at this location from  
[City/State]  
1991 to 2006 Present  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Spring, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept., 2006.

Vera Wright  
[PRINT NAME]

Vera Wright  
[SIGN NAME]



**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF****TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Betty Jean Young states the following:  
 [Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farm at  
 [Name of plant]  
 the facility located in Union Springs, AL. I worked at this location from  
 [City/State]  
12-3-2004 to 09-12-2006.  
 [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farm plant in Union Springs, AL, and  
 [Name of Plant] [City/State]  
 possibly other plants owned by Wayne Farm. If brought as a class  
 [Name of Plant]  
 action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of September, 2006.  
09-12

Betty Jean Young  
 [PRINT NAME]

Betty Jean Young  
 [SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Angela F. Youngblood states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
7/10/97 to 02/27/04.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 02 day of October, 2006.

Angela F. Youngblood  
[PRINT NAME]

Angela Youngblood  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Christine Youngblood states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
9/24/84 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 4<sup>th</sup> day of Sept, 2006.

Christine Youngblood  
[PRINT NAME]

Christine Youngblood  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Dernaillee Youngblood states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs. I worked at this location from  
[City/State]  
Jan 2003 to July 2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 26 day of Sept ~~Sept~~ 2006.

Dernaillee Youngblood  
[PRINT NAME]

Dernaillee Youngblood  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Shirley P. Youngblood states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of plant]  
the facility located in Union Springs Ala. I worked at this location from  
[City/State]  
9/18/92 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs Ala, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12<sup>th</sup> day of 9, 2006.

Shirley P. Youngblood  
[PRINT NAME]

Shirley P. Youngblood  
[SIGNATURE]